



November 10, 2016

**VIA E-FILE**

The Honorable Richard G. Andrews  
United States District Judge  
844 N. King Street  
Wilmington, DE 19801-3555

**Re: TQ Delta, LLC v. 2Wire, Inc.,  
C.A. No. 13-cv-1835-RGA  
TQ Delta, LLC v. Zhong Technologies, Inc.,  
C.A. No. 13-cv-1836-RGA  
TQ Delta, LLC v. ZyXEL Communications, Inc., et al.,  
C.A. No. 13-cv-2013-RGA  
TQ Delta, LLC v. AdTran, Inc.  
C.A. No. 14-cv-954-RGA  
AdTran, Inc. v. TQ Delta, LLC  
C.A. No. 15-cv-121-RGA**

Dear Judge Andrews:

As the Court is aware, Defendants have taken the position that the majority of relevant technical documents are in the possession of third parties. Plaintiff is still working with third parties to obtain the necessary information/source code to provide final infringement contentions, which are currently due tomorrow (although tomorrow is a Holiday so the deadline is Monday). Beginning last Wednesday, Plaintiff attempted to seek a consensual resolution with defendants on this issue. Defendants have rejected all of Plaintiff's offers.

Plaintiff intends to raise the issue with the Court via the discovery dispute procedure. Defendants have taken the position that Plaintiff's request for a discovery conference is not sufficient to toll the deadline and, therefore, Plaintiff needs a Court Order prior to the deadline.

To the extent the Court believes Plaintiff requires an Order to preserve its arguments for the discovery conference, Plaintiff respectfully requests that the Court enter the Order attached as Exhibit A extending the deadline for final contentions until the discovery conference with the Court. Plaintiff will be seeking the earliest date available for a discovery conference. Plaintiff attempted to schedule a call to the Court to request a hearing date today but not all Defendants are available and Defendants contend all Defendants must participate in the call.

We are available at the Court's convenience should Your Honor have any questions.

Respectfully submitted,

/s/ Brian E. Farnan

cc: Counsel of Record (Via E-Filing)

Brian E. Farnan